Robert C. Seldon, Esq

From: John.Truong@usdoj.gov
Sent: Thursday, February 23, 2006 2:16 PM
To: 'rcs@rcseldon-associates.com'
Subject: RE: Elion v. Jackson discovery extension

Bob:

If you have concerns about completing discovery within the current schedule, I am willing to consent to extension(s) should you need it to complete discovery.

Your email did not specify whether you consented to my request. Please clarify.

Again, many thanks for your understanding and cooperation.

John

-----Original Message-----
From: rcs@rcseldon-associates.com [mailto:rcs@rcseldon-associates.com]
Sent: Wednesday, February 22, 2006 11:14 PM
To: Truong, John
Subject: RE: Elion v. Jackson discovery extension

John -- This has really gotten out of control. I said in my last e-mail that I needed to have the discovery completed on the last schedule and, in all honesty, an extension of more than a month to complete responses to an initial round of written discovery is out of the norm and compromises our ability to move the case along under the current schedule.

Regards,

Robert C. Seldon, Esq.

Robert C. Seldon & Associates, P.C.
Attorneys-At-Law
1319 F Street, N.W.
Suite 305
Washington, D.C. 20004
(ph) (202) 955-6968 ext. 113
(fax) (202) 318-2287

rcs@rcseldon-associates.com